

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Drive
Price, Utah 84501

Reply to: 2820

Date: October 17, 1985

Mr. Richard Holbrook
Office of Surface Mining
Brooks Towers
1020 15th Street
Denver, Colorado 80202

ACT 1015/032
#3

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OCT 25 1985

DIVISION OF OIL
& GAS MINING

Dear Mr. Holbrook:

I have reviewed the proposal from OSM, September 5, 1985 UT DOGM Transmittal of MRP Amendment Plans to Increase Coal Production. My comment is that Genwal Coal Company must comply with the requirements specified in the Environmental Assessment prepared and approved by the Forest Service January 29, 1982, and the Road Use Permit approved by the Forest Service May 21, 1981.

The following eight management requirements have not been compiled with. The first six are from the EA, and the last two are from the Road Use Permit.

2. Public parking must be separate from mine parking and allow for vehicle turn-around.
 3. The Forest Development Road will be separate from and compatible with the mining operation.
 6. The Forest Development Road through the site will not be used as part of the coal handling operation.
 10. An adequate sewage disposal plan will be submitted and when approved, will be adhered to.
 22. The mining company shall provide the Forest Service with an unencumbered right-of-way across any fee lands encountered for the reconstruction of the Forest Development Road.
 23. The site will be so constructed as to encompass the entire surface facilities for the mining operation providing for unrestricted through-road access, while providing adequate protection of the adjacent stream.
- 2-1. Work Performance Schedule
- B. In any event, 15 months after haul operations begin, surface treatment must be applied. Until that time, sprinkling will be an acceptable means of dust control.

- C. If surface treatments prove to be inadequate, an asphalt surface shall be applied. This shall be applied as such time as surface treatments fail to prevent surfacing losses and effective fugitive dust control. This shall occur no later than 40 months after coal haul commences, if these conditions exist.

The surface treatments used to date have not done an adequate job to prevent surfacing losses and control fugitive dust. The proposed increased production will result in increased surfacing losses and fugitive dust problems, due to increased numbers of haulage trucks.

We have no problem with Genwal Coal Company increasing their productions from 150 MTPY to that proposed of 360 MTPY, when the items listed above from the Road Use Permit and Environmental Assessment are met.

If there are any questions, please contact us.

Sincerely,

/s/ William H. Boley

for
REED C. CHRISTENSEN
Forest Supervisor

cc: D-3, DOGM